

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership

Including Professional Corporations
NEIL A.F. POPOVIC, Cal. Bar No. 132403
ANNA S. McLEAN, Cal. Bar No. 142233
TENAYA RODEWALD, Cal. Bar No. 248563
MUKUND H. SHARMA, Cal. Bar No. 249125
LIEN H. PAYNE, Cal. Bar No. 291569
JOY O. SIU, Cal. Bar No. 307610
Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
Telephone: 415.434.9100
Facsimile: 415.434.3947
Email: npopovic@sheppardmullin.com
amclean@sheppardmullin.com
msharma@sheppardmullin.com
rodewald@sheppardmullin.com
lpayne@sheppardmullin.com
jsiu@sheppardmullin.com

Attorneys for Defendant,
SEAGATE TECHNOLOGY LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

IN RE SEAGATE TECHNOLOGY LLC
LITIGATION

CONSOLIDATED ACTION

Case No. 3:16-cv-00523-JCS

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING DOCUMENT
NUMBER 116, JOINT DISCOVERY
DISPUTE REGARDING THE LOCATION
OF NAMED PLAINTIFF'S DEPOSITION**

Date: June 14, 2017
Time: 9:30 a.m.
Place: Courtroom G
Judge: Hon. Joseph C. Spero

Second Consolidated Amended Complaint
filed: July 11, 2016

1 This Joint Stipulation is made by and between Plaintiffs and the putative class and Seagate
2 Technology LLC, by and through their respective undersigned counsel of record, with reference to
3 the following facts:

4 **RECITALS**

5 1. WHEREAS the Court held a hearing on the parties' Joint Discovery Letter Brief
6 regarding the location of named plaintiff Dudley Lane Dortch IV's deposition, ECF No. 116, on
7 June 9, 2017;

8 2. WHEREAS the Court asked the parties to meet and confer to see if they could
9 come to a negotiated agreement as to the location of Mr. Dortch IV's deposition;

10 3. WHEREAS the Court ordered lead trial counsel for the parties to appear on June
11 14, 2017 at 9:30 a.m. if they were unable to reach a negotiated agreement;

12 4. WHEREAS, the parties reached an agreement on June 13, 2017 that Mr. Dortch IV
13 would be deposed within 100 miles of Charleston, South Carolina, in return for Plaintiffs'
14 reimbursement of Seagate's following expenses: commercial flight and hotel fare for one of
15 Seagate's attorneys and half of Seagate's attorney's travel time to and from the deposition forum.

16 **STIPULATION**

17 IT IS HEREBY STIPULATED by and between the parties, through their counsel, that:

18 (1) the further hearing on ECF No. 116 set for June 14, 2017 at 9:30 a.m. is VACATED, and
19 (2) Mr. Dortch IV will be deposed within 100 miles of Charleston, South Carolina, in return for
20 Plaintiffs' reimbursement of Seagate's following expenses: commercial flight and hotel fare for
21 one of Seagate's attorneys and half of Seagate's attorney's travel time to and from the deposition
22 forum.

23 The parties agree to comply with this Stipulation and Order pending the Court's approval.

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1 Dated: June 13, 2017

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

2
3 By /s/ Neil A.F. Popović
NEIL A.F. POPOVIĆ

4 Attorneys for Defendants
5 SEAGATE TECHNOLOGY LLC

6 I, Joy O. Siu, whose user ID and password are used to efile this document, hereby attest that,
7 pursuant to Local Rule 5.1(i)(3), concurrence in this filing was obtained from each of the other
Signatories, in lieu of each's signature.

8 Dated: June 13, 2017

HAGENS BERMAN SOBOL SHAPIRO LLP

9
10 By /s/ Steve Berman
11 STEVE BERMAN

12 Attorneys for Plaintiffs and Proposed Class

13
14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

15 Dated:

16 The Honorable Joseph C. Spero
17 Chief Magistrate Judge